



Annual 47 C.F.R. § 64.2009(e) CPNI Certification

EB Docket 06-36

Annual 64.2009(e) CPNI Certification for 2011

Date filed: *Feb 28, 2011*

Name of company covered by this certification: *Global Data Systems, Inc.*

Form 499 Filer ID: *826980*

Name of signatory: *Brent J Berard*

Title of signatory: *VP of Finance and Business Operations*

I, Brent J Berard, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's CPNI rules. *See 47 C.F.R. § 64.2001 et seq.*

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.2001 *et seq.* of the Commission's rules. Please see the attachment.

The company *has not* taken any actions (proceedings instituted or petitions filed by a company at either state commissions, the court system, or at the Commission against data brokers) against data brokers in the past year.

The company *has not* received any customer complaints in the past year concerning the unauthorized release of CPNI (number of customer complaints a company has received related to unauthorized access to CPNI, or unauthorized disclosure of CPNI, broken down by category or complaint, *e.g.*, instances of improper access by employees, instances of improper disclosure to individuals not authorized to receive the information, or instances of improper access to online information by individuals not authorized to view the information).

Global Data Systems represents and warrants that the above certification is consistent with 47. C.F.R. § 1.17

which requires truthful and accurate statements to the Commission. The company also acknowledges that false statements and misrepresentations to the Commission are punishable under Title 18 of the U.S. Code and may subject it to enforcement action.

Signed

A handwritten signature in blue ink, appearing to read "Brent J Berard", is written over a horizontal line.

Attachment: Accompanying Statement explaining CPNI procedures



Ms. Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, SW
Room TW-A325
Washington, DC 20554
202-418-8165

February 28, 2011

Certification of CPNI Filing February 28, 2011

Certification from Global Data Systems, Incorporated (GDS), 537 Cajundome Blvd., Room 111, Lafayette, LA 70506, telephone 337-291-6500.

GDS, in accordance with the referenced document as well as DA-06-223 and Title 47 Section 64.2009, does hereby submit the following CPNI Compliance Certificate.

GDS is a VoIP service provider. GDS has state authority from the state of Louisiana.

GDS is in compliance with the referenced documents regarding CPNI and will continue to operate in compliance with these rules.

The following information is hereby provided:

- (a) GDS has not, nor do we have plans to utilize customer CPNI for any purposes other than in support of the customer's needs and requests in so far as it pertains to the service subscribed to by the customer. Should the situation arise in the future, a procedure is in place to ensure the customer is notified and approves release of appropriate information in advance. Additionally the company CPNI Officer will directly manage and control the use of and CPNI information.
- (b) Personnel who have reason to come into contact with any customer, as well as all supervisory personnel, have been trained not to process, use or release any CPNI without prior approval from the company CPNI Officer. All employees understand that failure to comply will result in disciplinary action in accordance with company policy.

- (c) Procedures are in place to properly maintain CPNI records regarding the use or release of CPNI either within the company or release to a third party. This record includes a description of the campaign, the products and services offered as part of the campaign, the specific CPNI that was used, the date, customer name, contact, and authorization, as well as the approval from the CPNI Officer.
- (d) A supervisory review process is in place to ensure compliance regarding the use of CPNI in any outbound marketing scenarios. Additionally these records will be maintained for a minimum of three years. Advance approval from the CPNI Officer is required before any information is used in any marketing, data collection or other related activity.
- (e) A CPNI Officer has been assigned. For GDS, the CPNI Officer is Brent J Berard, VP of Finance. I may be contacted at the above address or at 337-291-6526 or via email at brentb@getgds.com.
- (f) It is understood that GDS will provide the Commission written notice within five days regarding any opt-out mechanism that may not have worked properly. The details of this notice will comply with Title 47 Section 64.2009(f).
- (g) Should you have any questions or require additional information, please contact me at the address on this letter or at 337-291-6526. I may also be contacted via email at brentb@getgds.com

As VP of Finance and CPNI Officer for Global Data Systems, and as described above, I hereby certify that Global Data Systems, Incorporated is in compliance with Title 47, Part 64, Section 64.2009 regarding CPNI rules and regulations.



Brent J Berard
VP of Finance

February 28, 2011